

EXHIBIT 2

Susan M. Sharko
DRINKER BIDDLE & REATH LLP
A Delaware Limited Liability Partnership
500 Campus Drive
Florham Park, New Jersey 07932-1047
(973) 360-1100
Attorneys for Defendant DePuy Orthopaedics, Inc.

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

JUSTIN P. DOOLEY and BRIDGET
DOOLEY,

Plaintiffs,

v.

DEPUY ORTHOPAEDICS, INC.
ET AL.,

Defendant.

Civil Action No. _____

DECLARATION OF DOUGLAS K. CHIA

DOCUMENT HAS BEEN ELECTRONICALLY FILED

DECLARATION OF DOUGLAS K. CHIA

I, Douglas K. Chia, pursuant to 28 U.S.C. § 1746, hereby declare under penalty of perjury, that the following statements are true and correct, to the best of my knowledge and belief:

1. I have been Secretary of Johnson & Johnson since June 2010 and was an Assistant Secretary of Johnson & Johnson from April 2005 to June 2010.
2. Johnson & Johnson is a New Jersey corporation with its principal place of business in New Brunswick, New Jersey.
3. Johnson & Johnson International is a New Jersey corporation with its principal place of business in New Brunswick, New Jersey, and is a wholly-owned subsidiary of Johnson & Johnson.

4. Johnson & Johnson Services, Inc. is a New Jersey corporation with its principal place of business in New Brunswick, New Jersey, and is a wholly-owned subsidiary of Johnson & Johnson.

5. DePuy Orthopaedics, Inc. (“DePuy”) is an Indiana corporation with its principal place of business in Warsaw, Indiana. DePuy is a wholly-owned subsidiary of DePuy, Inc., a Delaware corporation with its principal place of business in Warsaw, Indiana. In 1998, Johnson & Johnson acquired DePuy, Inc. As a result of that acquisition, DePuy, Inc. is now a wholly-owned subsidiary of Johnson & Johnson International.

6. Johnson & Johnson Services, Inc. has no ownership interest in DePuy.

7. DePuy remains a separate and distinct legal entity from Johnson & Johnson and all other wholly-owned subsidiaries of Johnson & Johnson, including Johnson & Johnson International and Johnson & Johnson Services, Inc.

8. Johnson & Johnson is a holding company that directly or indirectly owns more than 250 operating companies in 60 countries; these operating companies employ approximately 114,000 people.

9. Johnson & Johnson and Johnson & Johnson International are holding companies that do not, by their very nature, manufacture any products. Johnson & Johnson Services, Inc. provides services to various Johnson & Johnson subsidiaries, which are paid for by the subsidiaries. It too does not manufacture any products of its own.

10. Johnson & Johnson, Johnson & Johnson International and Johnson & Johnson Services, Inc. have never researched, developed, designed, formulated or tested the Pinnacle Cup System.

11. Johnson & Johnson, Johnson & Johnson International and Johnson & Johnson Services, Inc. have never manufactured, packaged, supplied, distributed or tested the quality control of the Pinnacle Cup System.

12. Johnson & Johnson, Johnson & Johnson International and Johnson & Johnson Services, Inc. have never sold, promoted or marketed the Pinnacle Cup System.

13. Johnson & Johnson, Johnson & Johnson International and Johnson & Johnson Services, Inc. are not responsible for the regulatory approval or labeling of the Pinnacle Cup System.

14. Johnson & Johnson, Johnson & Johnson International and Johnson & Johnson Services, Inc. have no direct control or involvement in the day-to-day management of DePuy employees.

15. Johnson & Johnson, Johnson & Johnson International and Johnson & Johnson Services, Inc. maintain their own boards of directors independent of DePuy, with none of their directors sitting on boards of DePuy.

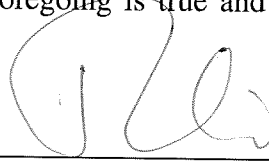
16. Johnson & Johnson, Johnson & Johnson International and Johnson & Johnson Services, Inc. maintain separate by-laws, minutes, corporate records, financial records and bank accounts from DePuy.

17. Johnson & Johnson, Johnson & Johnson International and Johnson & Johnson Services, Inc. do not pay for any of the research, salaries, raw materials or other operating expenses of DePuy.

18. Johnson & Johnson, Johnson & Johnson International and Johnson & Johnson Services, Inc. do not jointly own, operate or maintain any facilities with DePuy.

I declare under penalty of perjury that the foregoing is true and correct. Executed on

May 6, 2012.



DOUGLAS K. CHIA